

36897

Asbestos Dump Site

Comments on Site Operations Plan

- 1) Maps showing the proposed groundwater monitoring at the Great Swamp, White Bridge Road and 257 New Vernon Road site must be attached.
- 2) Stainless steel well casing should be specified as "316".
- 3) p.2-23
The following language must be included in section 2.10.3, addressing subsurface soil sampling.

In order to determine the full nature and extent of contamination at and emanating from the sites, soil samples will be taken by way of the random coring process. The number and depth of soil corings will be determined in the field, through consultation with EPA staff or designated representatives.
- 4) The aquatic impact statement lacks adequate details. We are requesting an exact design plan describing sieve size and preservation techniques etc.
- 5) p.2-23
The bailers used to collect groundwater samples must be certified as laboratory clean and dedicated to each sampling point.
- 6) p.2-26

The sampling procedure for a tap or spigot should include the removal of any aerating device to avoid loss of volatile compounds.
- 7) Please provide the EPA with the results of the performance audits performed by both YWC, Inc. and Princeton Testing Laboratory.
- 8) Table 2-2 should show a trip blank for sediments.
- 9) p. 9-20. The coring device used to collect sediment samples should be stainless steel or brass or one having a removable Teflon or glass inner liner. This will better insure the integrity of the surface layer of sediment and will minimize the loss of fine-grained materials from the sediment sample.

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- 10) Sodium thiosulfate should be added to volatile organics samples only if residual chlorine is present. This should be the case for your potable water samples, but not for surface or groundwater. Please make note of it in Table 5-2.
- 11) Provide the procedure the labs will use to clean sample bottles to be provided to FCHA. The procedure used by the EPA Contract Lab Program (CLP) has been enclosed.
- 12) Corrections in Table 5-2 follow.
 - a. "Methods for Chemical Analysis of Water and Wastes", March 1979, has been revised as of March 1983.
 - b. The analysis of metals in soils/and sediments should be performed in accordance with the CLP Statement of Work for Inorganics Analysis. Multi-media, Multi-concentration, revised July 1985.
 - c. The CLP Organics Statement of Work should also be referenced as the July 1985 revision.
 - d. The holding times for volatile, B/N/As and pesticide /PCBs in soil/sediment under CLP protocols is 10 days until extraction, 40 days after extraction.
- 13) The inorganic and organic data for all matrices must be validated by FCHA according to the following protocols:
 - a. Draft Inorganic Data Validation SOP, May 14, 1985.
 - b. Laboratory Data Validation, Functional Guidelines for evaluating Organics Analysis, May 28, 1985.
 - c. Laboratory Data Validation, Functional Guidelines for evaluating Pesticides/PCBs Analyses, May 28, 1985 with supplement dated June 24, 1985.

Copies of these documents are enclosed.
- 14) Any sampling equipment pre-cleaned in the lab should be wrapped in heavy gauge aluminum foil for transport to the field.
- 15) FCHA should perform a field system audit on their sampling personnel during the course of the remedial investigation to ensure the SOP is being followed. A copy of the resultant report must be provided to the EPA.